

**REPORT PREPARED AT THE REQUEST OF
KATHY LANGLOIS, CEO and PRESIDENT
OF THE SASKATCHEWAN LIQUOR AND GAMING AUTHORITY
REGARDING THE ALLEGATIONS OF BONNIE SWAN INDICATING
IMPROPER SOLICITATIONS BY PAUL WEBER**

Note: Brackets [] indicate information that has been withheld to comply
with privacy requirements of *The Freedom of Information and
Protection of Privacy Act*

Prepared by: The Honourable T.C. Wakeling

INDEX		
		Page
I.	Introduction	3
II.	Interpretation	5
III.	Hockey Tickets	7
IV.	Trip to Bahamas	11
V.	Fishing Trip	16
VI.	Summary	20
VII.	Final Comment	21
	Attachment (Invitation & Agenda) ..	A
	Thompson's Camps Inc. Invoice ..	B

I. INTRODUCTION:

1. Kathy Langlois, the President and Chief Executive Officer of the Saskatchewan Liquor and Gaming Authority (the "Authority"), has asked me to conduct an inquiry to determine the validity of certain allegations made by Bonnie Swan about certain improper solicitations made by Paul Weber, the Vice President of Operations for the Authority.

2. The specific nature of this inquiry is as outlined in the following portion of her letter to me dated May 14, 2001.

"We wish to retain your services for the purpose of the completion of an independent report for consideration by the Deputy Minister of Justice & Deputy Attorney General to determine whether charges under section 133 of *The Alcohol and Gaming Regulation Act* should be laid, or if further investigation by the police is required."

3. The allegations made by Ms. Swan which have been the subject of this inquiry are that Mr. Weber contravened section 133 of *The Alcohol and Gaming Regulation Act* (the "Act") by:

- (a) asking an officer of Corby Distilleries ("Corby") for tickets to a Maple Leaf hockey game he wished to attend; and,
- (b) attending two conferences or seminars held in the Bahamas for which all expenses were paid by Bacardi Canada Inc. ("Bacardi"); and,

- (c) going with Dave Innes, the President and Chief Executive Officer of the Authority, on a fishing trip to a Northern Saskatchewan lake with the President and another officer of Bacardi, for which all expenses were paid by the Authority.

4. [

] The section in question

reads as follows:

- s. 133(1) No member or employee of the authority or employee of the government of Saskatchewan shall solicit or receive directly or indirectly any commission, remuneration or gift from any person having sold, selling or offering beverage alcohol for sale to the authority pursuant to this Act.

5. [] position that to the extent these actions may appear to be sanctioned by section 4(b) of the Authority's guidelines, the guidelines were invalid as being contrary to the specific and unqualified nature of the legislative restriction. The following is the section of the guidelines[].

4(b) Acceptance of Gifts, Rewards, Favors

An employee should never accept gifts, rewards, gratuities or favors which could be viewed as payment for services rendered or influencing a business decision. Tokens of appreciation exchanged as part of protocol or the exchange of hospitality between persons doing business together are acceptable.

6. [

].

7. [

]. Mr. Weber, on the other hand, has provided

very complete details and in these circumstances I have no hesitation in accepting his

statements as reliable and an appropriate foundation for this report. [

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II. INTERPRETATION:

8. The starting point for this review would logically involve an interpretation of section 133 of the Act which, for convenience, is inserted once again.

s. 133(1) No member or employee of the authority or employee of the government of Saskatchewan shall solicit or receive directly or indirectly any commission, remuneration or gift from any person having sold, selling or offering beverage alcohol for sale to the authority pursuant to this Act.

9. The section clearly indicates that no member of the Authority's staff should ask for or receive either money or a gift from anyone in the liquor industry doing business with the Authority.

10. The following definition of solicit I take from Black's Law Dictionary (5th Edition):

Solicit. To appeal for something; to apply to for obtaining something; to ask earnestly; to ask for the purpose of receiving; to endeavor to obtain by asking or pleading; to entreat, implore, or importune; to make petition to; to plead for; to try to obtain; and though the word implies a serious request, it requires no particular degree of importunity, entreaty, imploration, or supplication. *People v. Phillips*, 70 Cal. App. 2d 449, 160 P.2d 872, 874. To awake or excite to action, or to invite. The term implies personal petition and importunity addressed to a particular individual to do some particular thing.

11. It is apparent that soliciting involves some overt act requesting another to provide an advantage of some nature. Therefore, a solicitation which constitutes a breach of section 133 must involve a request seeking some advantage directed to some party in the liquor industry which does business with the Authority. The section does not directly state the advantage must be to the person who solicits it, and I conclude that is not its intent. A solicitation cannot be any less a breach of section 133 merely because the advantage sought to be obtained would be for the benefit of and enjoyed by another. If that were not the case, an employee could avoid the restriction created by section 133 merely by saying the benefit was for another. The assumption must be that an advantage to another also represents an advantage to the one soliciting it.

12. The other restriction in section 133 is that even though no solicitation is involved, the receipt of a gift is likewise prohibited. Again, it is no doubt intended that the restriction created by the section cannot be circumvented by saying of the gift, it was never requested.

13. The result of the above is that I am of the view this section creates an absolute barr to an employee seeking to obtain any advantage from someone in the liquor business who deals with the Authority, whether the advantage is for that employee or someone else. Similarly, it prevents the acceptance of a gift, even though it is gratuitously offered.

14. The absolute and unqualified nature of this section has no doubt created some practical difficulty for the Authority. This is not to suggest the general principal upon which this section was based was not sound, but in many situations, strict compliance with the section is hardly possible within usual and accepted business practices. It was no doubt for this reason that in 1995 the management of the Authority issued guidelines to its staff which contained the section 4(b) previously referred to. The purpose was to indicate management's view of how section 133 was to be applied.

15. I fully agree these guidelines were reasonable and provided a useful means of indicating some gifts of a purely nominal nature should not be seen as a violation of section 133. Unfortunately, the reasonable justification cannot be the basis for what amounts to an attempt to amend the section in question when the authority to amend rests solely with the legislature. For this reason, I am unable to apply the guidelines to accomplish what the Authority had in mind when they were issued. More will be said of this problem in the balance of this report.

III. HOCKEY TICKETS:

16. Ms. Swan indicated she was aware Mr. Weber had asked Corby whether they could provide him with tickets to a Maple Leaf hockey game in Toronto. The tickets were provided and Mr. Weber and another attended the game. The tickets were not paid for and consequently it was a clear case of a solicitation made contrary to section 133.

17. Mr. Weber, on the other hand, indicates there were two occasions when he arranged for the obtainment of hockey tickets from Corby. On the first occasion his niece was going to be in Toronto and wondered if he could get her two tickets for a Maple Leaf hockey game. He

contacted [] Corby, and asked him if he could arrange to get these tickets which his niece would pay for. The representative indicated he would contact the Toronto office and if they were available he would have that office contact her. Mr. Weber understood that his niece received 2 tickets and Corby refused to take any payment.

18. The second occasion was when a friend whose dad had worked for Corby asked him if he could get tickets for a hockey game at Maple Leaf Gardens for a group of 7 teachers from Thunder Bay who were going on a special trip to Toronto. Mr. Weber was probably approached because he had at one time lived in Thunder Bay and was acquainted with the person who had worked for Corby. He again called [] and he indicated he would see what could be done and it was understood that Corby would deal directly with the Thunder Bay teachers if tickets were available. It was indicated by Mr. Weber these teachers intended to pay for the tickets but he understands Corby refused to accept payment. It is probably reasonable to assume this was Corby's general practice when providing tickets of this nature.

19. Taking the definition of section 133 to be as earlier stated, I have to conclude that the request for tickets made by Mr. Weber of the representative of Corby does involve a solicitation in violation of section 133. This is so even though he never intended to personally attend the game and indicated the intention of the recipients to pay for the tickets. It is the request for tickets not otherwise available which must be considered a solicitation even though others were to receive the benefit of the tickets.

20. I leave it to others to review and consider what sanction should follow this solicitation by Mr. Weber but I am satisfied injustice would be done should his conduct result in charges being laid under the summary conviction procedures of the code as section 142 of the Act seems to

provide. I say this for a number of reasons, the most significant of which has a foundation in the overall generally accepted recognition that companies such as Corby and more locally, Molsons, have traditionally supported the Canadian sports industry. They have done this by sponsoring sports events, buying season and special event tickets far in excess of its corporate needs and making it known to those in the industry they are prepared to make them available, to the extent reasonably possible to customers and friends. I have no personal knowledge of how important to local sports developers such support may be, but I would be surprised if it is not of critical importance. Without such supporters, I am sure events such as the Memorial Cup Tournament recently held here could not be so successfully held or the continued very marginal existence of most Canadian Football League teams could be maintained.

21. These companies, such as Corby, recognize that some of the profit generated from local consumption of their product should be used to support local enterprises, including the Toronto Maple Leafs. Although that team is privately owned, it also needs local support to exist as the situation with the Grizzlies in Vancouver clearly indicates. In addition, that team constitutes a major economic force in the City of Toronto to say nothing of the pride and satisfaction it provides to the citizens of Toronto and beyond.

22. I doubt tickets of this nature are bought by Corby to unduly influence persons such as Mr. Weber, more likely they are bought to provide support for a local sporting endeavour and they then make these tickets available to its friends and customers in a very open fashion. I would find it unreasonable if Mr. Weber should be seen as a serious offender for the action he took regarding sporting tickets of this kind which by their very nature were intended for its friends and customers. Nor is Corby exposed to any unwanted pressure for it need only indicate that the requested tickets have already been spoken for.

23. There is another aspect of these tickets which I think should be considered. I am advised some members of the Authority's staff were sent to Toronto to attend a seminar arranged by Bacardi on the topic of "Shelf Management". This seminar started on a Monday and when those attending this seminar (which included those beyond the liquor industry such as Coca Cola) arrived in Toronto on the weekend, they were each provided a ticket to a Raptors' game taking place that Sunday evening. They were glad to attend and I cannot fault them for doing so, except that while no solicitation is involved, a gift has been received by the Authority delegates contrary to the dictates of section 133. I do not believe the people of this Province really require some form of retribution for acceptance of this offer of a chance to see a professional sporting event not available in their home City. I view this as an example of how extreme and unrealistic is the restriction on gifts imposed by section 133. This comment is somewhat of an aside as it does not involve a solicitation, but it does indicate the extent to which companies like Bacardi are involved in support of both professional and amateur sport to the knowledge of the public.

24. I cannot help but feel that if the government is going to take an active role in the business community, as it does by enjoying a monopolistic position in the sale of liquor in the province, it must develop a reasonable approach to industry practices. I do not intend to cast too broad a net by this observation as there is a recognized difference between the freedom enjoyed by private enterprise and a Crown Corporation, but the Authority's employees cannot be completely insulated from being involved in the reasonable practices of the industry nor should they be.

25. [] response involving the laying of charges against Mr. Weber. Nor do I see that as an appropriate response given the senior officers of the Authority have since 1995 issued guidelines which while not approving solicitations, have indicated an acceptance of the fact industry practices require a reduction in the severity of the restrictions imposed by section 133. The unfairness I see is more readily evident when it is seen that management, by its guidelines, has indicated it believes section 133 is too restrictive to be of practical application, yet if charges are laid, the Authority would be powerless to provide any assistance.

IV. TRIP TO THE BAHAMAS:

26. []
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27. The trip he went on was at the invitation of the government of the Bahamas and the invitation and agenda are attached to my report. At my request, Mr. Weber obtained particulars of the other invitations which were received and accepted. The following is a summary of this information:

Year	Place	Invitees from each Province
1995	Puerto Rico	the President, C.E.O. and one other
1996	Puerto Rico	the V.P. and one other
1997	Nassau	The President and C.E.O. and one other
1998	Nassau	the V.P. and one other
1999	Nassau	the President and one other

28. These seminars were discontinued after 1999, apparently because of the issue raised by the media in Ontario over the appropriateness of accepting such an invitation. No inquiry was ever initiated as a consequence of this public attention to the seminar so there is no report similar to my own that I might turn to for assistance.

29. There is no question that although the invitation was from the government of the Bahamas, all the costs involved were paid by Bacardi, it was their distillery which was visited, their agenda and choice of topics, and their product which was being promoted. Part of that promotion involved the provision of three bottles of Bacardi product in each delegates' room, namely a bottle of a liqueur, a bottle of limon (a new product) and a bottle of rum.

30. Mr. Weber's recollection is that each of the other provinces were present including British Columbia. [] Mr. Weber states British Columbia has a policy that they will not send representatives on trips or plan visits if the invitation comes from a single company, but will send representatives if the invitation comes from a group or association of companies or, as in this case, the Government of the Bahamas.

31. Mr. Weber went to the Bahamas with Mr. Dave Innes, the then President of the Authority, in February of 1998 and their attendance was with the knowledge and approval of Mr. Maynard Sonntag, the Minister of this department.

32. The attached agenda gives particulars of the program that was presented and Mr. Weber found it provided very useful information. In addition, there were dinners served at an

elegant hotel in a beautiful location but these pleasures were shared with their counterparts from other provinces which provided an opportunity for a useful exchange of information. There was also an opportunity provided for a game of golf for those who enjoyed the game so no case can be made that this was all work and no play.

33. Since consumption of all the liquor provided in each room would be a challenge, the bottles were available to be brought back with each delegate. Mr. Weber did not bring any back but he did accept a gym bag containing such things as a beach towel, golf balls, t-shirt and similar branded merchandise. These objects were kept to be included in an Authority staff auction, the proceeds from which added to the staff contribution to The United Way.

34. The current status of these seminars is uncertain. There has been no similar invitation extended since 1999 and it is understood this is a consequence of the unfavourable media and political attention generated in the Province of Ontario as referred to earlier.

35. This is an adequate summary of the facts relating to the Bahamas seminar sufficient to permit me to indicate my opinion as to whether attendance at this seminar constitutes a solicitation or gift in breach of section 133. However, before indicating my opinion, there are some other situations which seem to me to be worthy of consideration.

36. One of these situations involves the attendance by Ms. Swan at a seminar conducted by Corby at Windsor, Ontario in June of 1998. This was designed to provide attendees with a tour of their distillery, to be advised of product developments and generally to be informed of related issues not unlike the matters outlined in the Nassau agenda with the probable exception of international industry developments or trade issues. On her completion of this three-day

seminar, she was presented with a 26 oz. bottle of Canadian Club Rye which was specially wrapped and had this inscription on it: "Bonnie Swan June 24, 1998". She took the bottle home with her but concluded she should not keep it, turned it over to Mr. Weber and it is now in a show case in the office of the Authority. [

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37. I find it significant that Ms. Swan has not only attended such a seminar, but has arranged for some of her store managers to also attend as

The difference between this seminar in Windsor and the one in the Bahamas does not appear to be significantly different beyond location.

38. [

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39. The other circumstance I think must be considered is the regular attendance by employees at conferences and seminars being organized by associations of distillers. For instance, a group of California winegrowers and bottlers regularly invite attendance at seminars

in California at which information is presented about wine products and opportunities provided for inspection of wineries. These invitations are quite frequently accepted and the employee (who is often a store manager) has the airfare provided by the Authority but otherwise the cost is borne by the California association sponsoring the seminar. The significant difference between these seminars and the ones earlier mentioned is they are sponsored by a group of producers rather than a single company. These seminars are viewed as providing useful information to store managers and others engaged in sales so they can become more knowledgeable about the product they are marketing. Many customers are apparently quite interested in obtaining information about the products they are purchasing and ask perceptive questions of store personnel.

40. There can be no doubt the attendance by Mr. Weber at the seminar in the Bahamas was not the result of a solicitation. Neither Mr. Weber nor any employee of the Authority sought an invitation to attend this seminar. That then leads to the conclusion that if the attendance involves a breach of section 133, it must be on the basis it constituted a gift to him.

41. I have no doubt anyone from Saskatchewan being asked to attend a seminar in the Bahamas in mid-February would be glad to accept but that in itself does not mean attendance at such a seminar constitutes a gift. In this case, the seminar had an agenda which dealt with several topics, many of which were of interest and of actual value to the Authority. The agenda for this seminar was known to Mr. Weber's Chief Executive Officer and the responsible Minister and they each concluded there was sufficient in it to warrant the attendance of a senior officer. If one is going to conclude there is a gift involved, it had to be as much a gift to the Authority as to Mr. Weber, for it was the Authority which was the recipient of any advantage gained by further training and experience its officer obtained. In any event, I see no basis for a decision

that the enjoyment provided Mr. Weber from a trip of this nature was of such a nature that it so greatly outweighed the benefit the Authority received that it must represent a gift.

42. I am aware of seminars that are held in very attractive and expensive places, such for example as ones held in Whistler in the mountains. Certainly the participants who attend such seminars have great enjoyment in the beauty of the surrounding scenery, but assuming the agenda is one of substance and value, I have never heard it said the participants were the recipients of a gift, nor do I believe it should be so considered.

43. In the result, I see no violation of section 133 as a consequence of Mr. Weber's attendance at the Bahamas seminar. My reference is to Mr. Weber because of the nature of my mandate, but obviously the same conclusion applies to others who have attended this conference.

V. FISHING TRIP:

44. My first mandate only involved the question of whether this trip offended section 133 as involving a solicitation or receipt of a gift. When the question of the fishing trip was raised by Ms. Swan, I informed her I would consider the issue [] my first impression was that it was neither a solicitation or a gift and consequently did not fit within my mandate.

45. Since that time, the issue has taken on further political overtones and my mandate has been broadened as indicated by the following portion of the further letter I have received from Kathy Langlois dated May 30, 2001:

"In addition to this report, we also wish to retain your services to provide your opinion, for consideration by the Deputy Minister of Justice & Deputy Attorney General concerning a fishing trip that took place at Authority expense with the then Minister for the Liquor and Gaming Authority, Maynard Sonntag, the then CEO of the Authority, Dave Innes and the CEO of Bacardi - Martini Ltd."

46. I first point out that [] Mr. Weber had been one of those involved in the fishing trip but this is not so. It was originally his intention to also go on the trip but other commitments changed his plans. He did, however, complete arrangements for the trip and I have relied upon the information he has provided.

47. The fishing trip had its origins in a discussion which took place at a Christmas party in Regina hosted by Bacardi to which many of the Authority staff were invited. Manual Diaz, the President of Bacardi, was in conversation with Mr. Innes and Mr. Weber who were extolling the virtues of Saskatchewan including the very fine northern fishing opportunities. Mr. Diaz indicated he had travelled extensively, including an African safari, but had never had the opportunity to enjoy a Northern Saskatchewan fishing trip. Mr. Innes and Mr. Weber suggested that perhaps the next time Mr. Diaz was in Saskatchewan on a business trip they would try and arrange an opportunity for him to sample Saskatchewan's northern fishing.

48. In the spring of 1998, Mr. Diaz indicated he was coming to Saskatchewan to discuss a business proposal and to visit one or two liquor outlets. Mr. Innes concluded the Authority should take advantage of the situation to take Mr. Diaz on the fishing trip they had previously discussed. Mr. Weber was asked to complete arrangements and it was worked out that Mr. Maynard Sonntag, the Minister responsible for the Authority, and Mr. Innes would pick up Mr. Diaz and [] for Bacardi, at Saskatoon and travel north

by van obtained from the government motor pool. They drove to Prince Albert where they visited a liquor outlet and the Northern Lights Casino. They then went on to Waskesiu where they wished to show Mr. Diaz and [] a new kind of liquor store they had opened there and then on to Missinipi which is north of La Ronge.

49. Mr. Weber had arranged to order and have available a supply of groceries and had reserved one of the Thomson Cabins north of Missinipi. The four drove there, stayed overnight did some fishing and returned to Saskatoon. The expenses were borne by the Authority but no liquor was included and I assume that those who wanted it would supply their own. There was an opportunity for fishing, for business communication and a pleasant social exchange. The cost involved has been documented for me as follows:

Paid CVA for use of the van	\$ 358.21
Groceries	667.19
Lodging for three nights at Thompson's Camps Inc. plus fishing rods	<u>495.35</u>

TOTAL	<u>\$1,520.75</u>
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(Thompson's Camps Inc. invoice attached)

Apparently, Mr. Sonntag stayed in a relative's cabin so his lodging was not an expense for him. There was the need for two boats and he was also able to obtain the use of this relative's boat at no cost.

50. The parties, by these summarized facts, met all their objectives. They met and discussed what the Bacardi officers wished to have considered, they saw typical examples of the liquor stores in this Province with particular reference to the new Waskesiu outlet and were

treated to an opportunity to enjoy companionship and the fishing opportunities for which this Province is famous.

51. I find nothing in this trip which offends section 133. No solicitation is involved and no gift was received by any member of the Authority from an outside source. That decision would have concluded my involvement in this incident were it not for the enlargement of the parameters of my original authority as provided by the letter of May 30.

52. I view this enlargement as a request to apply my experience as a lawyer and former judge to assess the reasonableness and appropriateness of this trip, quite aside from section 133. I am not sure how well my background has qualified me to make such an assessment, as it lacks the governmental and political experience which some may see as an important factor. Nonetheless, applying whatever experience I have gained, I have no hesitation in finding what took place as both reasonable and appropriate.

53. This situation involves the attendance in Saskatchewan of the most senior representative of Bacardi, a company with whom the Authority does business to the extent of approximately \$9,000,000 annually which makes it one of the Authority's largest suppliers. The President of such a company quite reasonably can expect to receive the attention of both the responsible Minister and President of the Authority when he indicates his intention to be in Saskatchewan to present a proposal he wishes to advance. It seems to me to reasonably follow that when the officers of the Authority considered the many occasions Bacardi had shown courtesies to the Authority staff, some of which ways I have already indicated, the opportunity to return these courtesies in some reasonable fashion was very appropriately grasped.

54. It is clear from what I have said that I find their trip to be a properly extended courtesy which was kept to a very modest scale. I make reference to the modest nature of the trip because my background in the private sector brings to recollection trips I became aware of provided for salmon fishing at Campbell River or to fly-in fishing camps provided gratuitously to the executives of business customers as an expression of appreciation for their business and a method of cementing business relationships. I accept the Authority probably should not operate in just the same fashion as a private sector company, but neither should it attempt to insulate itself entirely from the established ways of the world of commerce. I do not believe citizens expect such insulation or see it as necessary. If courtesies and benefits have been bestowed upon the staff of the Authority, I would be surprised if public opinion resented recognition of those benefits and courtesies and some modest form of a return of those courtesies made by the Authority.

VI. SUMMARY:

1. I do not find Mr. Weber's trip to the Bahamas to offend section 133.
2. I do find his request for the provision of tickets to his niece and friends to be a solicitation and as such offends section 133.
3. I do not recommend that charges be laid against Mr. Weber or discipline be initiated for the reasons provided in my report, nor do I see that further investigation by the police is required.

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4. I do not find the fishing trip to offend section 133 or to be an unreasonable or inappropriate action by Mr. Innes, the then Chief Executive Officer of the Authority.
 5. To the extent the guidelines are in conflict with section 133, they are not valid and cannot support a justification for actions prohibited by section 133. They are nonetheless quite reasonable, hence an appropriate amendment to *The Alcohol and Gaming Regulation Act* should be made at the earliest date.

VII. FINAL COMMENT:

55. I was encouraged to make such further comment as might to me seem appropriate in light of my findings.
56. I see section 133 as much too restrictive. It cannot reasonably be adhered to in the light of existing industry and community practices, for example, the business lunch where the cost is paid by the liquor company representative. There is, however, no opportunity to soften or otherwise restrict its impact since it is the legislated statement binding on the parties. In the result, this section should be amended to permit a more reasonable and practical approach to the problem it is intended to address. I have not formed a specific opinion on the nature of the amendment, but consideration should be given to the way this problem has been approached by the regulations to *The Public Service Act* in which the following section is found:

General Guidelines on the Application of the Policy

3. **Acceptance of Gifts:** A public employee should never accept any gift or service which could be viewed as a payment for services rendered through his/her employment in the public service.

- (a) a public employee may accept any gifts between friends; the normal exchange of hospitality between persons doing business together; or tokens exchanged as part of protocol
- (b) public employees accepting any payment, gift, honorarium or gratuity, in addition to their salary paid by the government, which is actually or may be viewed as payment for services provided through their public employment, would be in conflict with this guideline

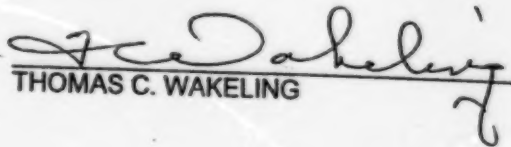
57. Other similar approaches have been adapted in other enactments, *The Legislative Assembly and Executive Council Act* for example. I am also aware that other Provinces including Alberta and Ontario have found a way to regulate the conduct of its employees without making the restrictions so severe as to be impractical.

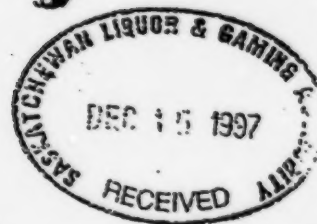
58. I do not think it is expected I should draft an amendment to section 133, but I do think the approach taken in *The Public Service Act* has many advantages. It leaves the nature of the guidelines to be established by regulation which provides the Minister and Cabinet with a broader discretion and permits changes to be made much more readily as circumstances may dictate.

59. Before concluding my report, I wish to make it clear I am aware that while reasonable gifts and exchanges of courtesies are generally seen as acceptable in the guidelines or legislation of other provinces, no effort has been made to reduce the limitation on solicitations. I agree that a solicitation involves an overt act to attempt to obtain what has otherwise not been preferred as a gift and I understand that to be objectionable. I would, therefore, not want my earlier remarks to be seen as supporting the appropriateness of solicitations, rather these

comments were made with the intent of indicating why I felt it was not appropriate to view Mr. Weber's actions regarding the hockey tickets as warranting further inquiry by the police or the initiation of summary conviction procedures.

RESPECTFULLY submitted June 19, 2001.


THOMAS C. WAKELING



MINISTRY OF TOURISM

The Commonwealth of The Bahamas

TELEPHONE (242) 356-7591

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OFFICE OF THE MINISTER

P.O. BOX N-3701

NASSAU, N.P.

BAHAMAS

November 10, 1997

Mr. Dave Innes
President & C.E.O.
Saskatchewan Liquor and Gaming Authority
2500 Victoria Avenue, 9th Floor
P.O. Box 5054
Regina, Saskatchewan
S4P 3M3

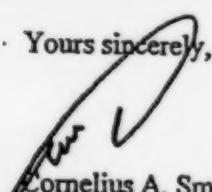
Dear Mr. Innes:

The Government of The Bahamas will be hosting a trade seminar for the Canadian Association of Liquor Jurisdictions from February 19th to the 22nd, 1998 in Nassau.

We hope to combine product knowledge sessions and plant tours to familiarize industry people with various international trading options between the two countries.

Accordingly we invite two candidates from your liquor jurisdiction to participate with us. A detailed agenda is attached for your convenience, however, if other topics interest you, please advise us.

Yours sincerely,


Cornelius A. Smith
MINISTER OF TOURISM.

GOVERNMENT OF THE BAHAMAS
INFORMATION SEMINAR
February 19 - 22 1998

A G E N D A

- (I) The Unique Nature of Rums and Liqueurs from the Bahamas
 - (a) Quality
 - (b) Taste
- (II) Tour of Rum Making Facilities
- (III) NAFTA & The European Alliance
- (IV) Trading Opportunities - Rums and Liqueurs
- (V) 1997 Business Plan
- (VI) New Product Developments
- (VII) Automated Data Bases



Saskatchewan
Liquor and Gaming
Authority

Saskatchewan

Head Office
Box 5054
Regina, Canada
S4P 3M3

December 31, 1997

COPY

Cornelius A. Smith
Minister of Tourism
The Commonwealth of The Bahamas
P.O. Box N-3701
Nassau, N.P.
Bahamas

Dear Mr. Smith:

Thank you for your kind invitation for two representatives of the Saskatchewan Liquor and Gaming Authority to participate in your trade seminar for the Canadian Association of Liquor Jurisdictions.

Dave Innes and I are pleased to accept your invitation and we look forward to participating and sharing information with you and our colleagues from CALJ regarding the production, marketing and distribution of Rums and Liqueurs from the Bahamas.

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'P. Weber', written over a horizontal line.

Paul B. Weber
Vice-President of Operations

cc: Dave Innes

NAME Mr. Riquon - Gaming Authority
 STREET Box 5054 - 2500 Victoria Ave.
 CITY Regina SK. (Dane Jones)
 POSTAL CODE S4P 3M9 PHONE NO. 787-1737
 CABIN 513 ☒ CHARGE ☐ MASTERCARD
 DATE June 15 ☐ PAID ☐ VISA 4857

Licence		
Fly-In		
One Day Fly-In		
Boat & Motor <u>1 x 95.00 x 2 days</u>	<u>190</u>	<u>00</u>
House Boat		
Fish		
Cabin <u>3 x 30.00 x 3 nets</u>	<u>270</u>	<u>00</u>
Cabin		
Conference Room		
Tackle		
Meals <u>821.657</u>	<u>30</u>	<u>00</u>
Shore Lunch		
Gas		
Guides <u>1 cooler</u>	<u>5</u>	<u>00</u>
Sundry <u>2400 rental x 2 days</u>	<u>40</u>	<u>00</u>
Sub Total	<u>535</u>	<u>00</u>
Tax PST	<u>1890</u>	
Tax GST #105269641	<u>3745</u>	
TOTAL	<u>591</u>	<u>35</u>
Deposit	<u>100</u>	<u>00</u>
Balance	<u>491</u>	<u>35</u>

[Signature]
 THOMPSON'S CAMPS INC.

Interest will be added at 2% per month on all overdue accounts.
 DID YOU PAY YOUR GUIDE? up 4.00 pd
495.35



THOMPSON'S CAMPS INC.

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